INTEGRATIVE THERAPEUTICS INC.









NF Formulas

PhytoPharmica

Tyler Encapsulations

Vitaline Formulas

June 25, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740



Notification of structure-function claims

Dear Sir:

This letter is to notify you that the following product manufactured, packed, and/or distributed by Integrative Therapeutics, Inc. (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has literature which contains a statement provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Integrative Therapeutics, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and complies with section 403(r)(6) of the act.

Product Name

Statement

ImmunoKids®

"ImmunoKids® is a dietary supplement specifically formulated by leading physicians in child neurological development for immune function support*."

ingredient(s) to which claim refers

Vitamin C Calcium Zinc

IP-6 (inositol hexaphosphate)

Inositol

Grape (Vitis vinifera) seed polyphenols

soy bean (Glycine max)

Cat's Claw extract (Uncaria tomentosa)

Aloe (Aloe vera)

Citrus Bioflavonoids

Monolaurin

Pine Bark standardized extract (Pinus maritima)

I certify that the information contained in this notice is complete and accurate, and that Integrative Therapeutics, Inc. has substantiation that the statement is truthful and not misleading.

Mario Roxas, N.D.

Director of Technical Affairs

Date

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Product Name ImmunoKids®

Statement

"It includes vitamin C, bioflavonoids, and other effective antioxidants extracted from grape seed and French Maritime pine bark as well as the protective effects of zinc to support production of lymphocytes*."

ingredient(s) to which claim refers

Vitamin C Calcium Zinc

IP-6 (inositol hexaphosphate)

Inositol

Grape (Vitis vinifera) seed polyphenols soy bean (Glycine max)

Cat's Claw extract (Uncaria tomentosa) Aloe (Aloe vera)

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